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**Sent:** Wednesday, March 22, 2006 10:10 AM  
**To:** MLPAComments@resources.ca.gov  
**Subject:** MLPAComments: The Resource Legacy Preferred Alternative

How are you justifying the NEED for such "High Protection"

Quoting the Grand Jury of San Luis County, March 7, 2006 "Fishing has become a highly regulated business - so much so that it has been largely regulated out of existence on the Central Coast. The economics of the fishing industry are such that many commercial boats are either gone, or very shortly will be gone"

Quoting The Tribune, March 9, 2006. " Fishery regulators on Wednesday banned bottom trawling in nearly 150,000 square miles of federal waters off the West Coast." This is in addition to the Rockfish Closure Area.

The Nearshore Fishery regulations implemented after the MLPA act was instituted in 1999, including restricted access, the 60:20 rule, quotas, trip limits, closures, size limits resulting in a decrease of 80% of the nearshore fishery catch. Large reductions in the spot prawn fishery catch have also occurred in the last few years including making it a trap-only fishery.

The concerns cited by the environmental community are based on fishing practices that occurred 7-10 years ago! Things have drastically changed. Overfishing is not occurring. Did you hear the fishery scientist Alex McCall state that California is the most highly regulated coastline in the world? Did you hear Richard Parrish discuss how the displacement of fisherman into small areas would result in negative impacts on the marine ecosystem? Did you hear Tom Barnes demonstrate that the fish stocks are improving? Did you hear the fish and game report that there is no more gill nets, long lines, and limited trawl inside state waters? Where is the need for HIGH protection? Against what?

How are you showing concern for the local fishing industry? Where is the so called BALANCE?

This process already failed at 2 other attempts because of their disregard for the people that these laws will most likely effect.

You had an opportunity, before the addition of Package S, to actually make these important individuals feel like their concerns were valid and respected and therefore gain their cooperation for the rest of this process, monitoring, and enforcement. BUT you choose to throw democracy out the window and allow a few biased elite to govern your decisions.

Package 1 was never given credit for it's ability to strike a balance yet still offer the protections the SAT professed was needed. It is interesting how Package 1 WON the majority of votes as the preferred alternative in the CCRSG process but that this vote was never given any credence with the BRTF.

No matter what the fisherman put out it was going to be squewed as "not enough" by the environmental community and science team. These people are "antifishing" activist. They have their own agenda which includes getting rid of "the last of the buffalo hunters" as quoted by an individual supporting Package 2. These people are not interested in current regulations or quality scientific data. Their only concern is to decrease fishing effort as much as possible.

Package 3R most closely resembles Packages 2,3and AC that were written by the most extreme environmental groups in the world! It is noticeably biased toward the desires of the people funding the process. This is going to cause an incredible amount of resentment and a feeling of betrayal among the fishing communities that will haunt you the rest of this process.

Why does Package 3R DISREGARD the Master Plan Frameworks (MPF) consideration for socioeconomic impact, SAT size and spacing and replication of habitat guidelines, and the task of submitting proposals?

Package 3R DID NOT take into consideration socioeconomic impacts as written in the act. The fact that you are taking at least 80% of all the prime fishing areas demonstrates your inconsideration. Speaking for the southern

area, you took Big Sur, Julia Pfeiffer Burns, Big Creek, Piedras Blancas, Estero, Pt Buchon, Purisma, and most of Arguello.

These make up the most prime nearshore fishing reefs in our area. We are left with small reefs and sand. Those reefs are the large reefs capable of taking pressure from the local fishing community. Displacing everyone into small areas is going to have a negative impact on the fisherman and the ecosystem.

The salmon fisherman will lose their main salmon tacks from Big Sur to Lopez Point.

The Morro Bay spot prawn fishermen will lose 60% of their submarine canyons along the Big Sur Coastline. The fisherman will lose many places that have been enjoyed by old and young alike for years. Becketts and La Cruz, in Piedras Blancas, was used by abalone divers, sport and commercial fisherman for years. Big Sur has been historically fished by spot prawn fisherman since the 1950's and is an important location for the nearshore live fisherman and sport fisherman as well. Purisma is an important deep nearshore fishery for Bolina and Southern Arguello is important for the squid fishery and displaced Channel Islands fisherman. Salmon fishing along the Central Coast has been a mainstay of our local fishing economy since the 1940's.

You will be destroying the Central Coast's fishing heritage unnecessarily. This is not the "spirit" of the Act! Page 41 of the MPF says "Spacing will need to be on the order of no more than 50-100 km apart "or about 30 to 60 miles. How do you justify placing reserves less than 10 miles apart? This is too much!

Page 41 of the MPF says "Larger MPAs spanning 10-20km (6-12.5 miles) of coastline are probably a better choice. Where is it said the reserves have to all be 18 square miles! Anyways, the F&G Commission specifically said that those were guidelines not prescriptions and needed to be considered in the context of the region and their current management and this is only 1 of 6 goals and objectives.

Page 42 of the MPF says "Ideally at least five replicates (but a minimum of three) containing sufficient representation of each habitat type, should be placed in the MPA network within each biogeographically region (Oregon to Pt. Conception) and for each habitat to serve these goals." "Subregions" are not mentioned. Just in the span of 20 miles along the Big Sur Coast you have 3 replicates of similar deep canyon habitat for the entire bioregion! This is too much! Along the entire study region you take at least 7-8 of the major nearshore rock reef habitats. It severely impacts the local fishing community when you take most of that habitat in one area.

Page 32 of the MPF asks for "the Department to submit those alternatives that are consistent with the MLPA, a preferred alternative, and other pertinent information from the regional groups and the task force to the Commission." It is not worded in a way that clearly states that the task force is to develop their own separate alternative. It was understood by the stakeholders that the preferred alternative would be a product of the CCRSG process. This is why a vote was taken at the CCRSG.

A recent email I received from a Channel Island fisherman sums it up well. "You guys got HOSED! They played you like a \$5 whore, we knew that was going to happen. That's exactly what they did to us. They find out where all your best fishing areas are and take them."

Tom and Sheri Hafer